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*Proposed Counsel to the Debtor  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

In re:	§	Chapter 11 (Subchapter V)
	§	
NEW-TRONICS LTD., <sup>1</sup>	§	Case No. 23-42553-elm11
	§	
Debtor.	§	
	§	

**DEBTOR’S EMERGENCY MOTION TO EXTEND DEADLINE  
TO FILE SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

TO THE HONORABLE EDWARD L. MORRIS, U.S. BANKRUPTCY JUDGE:

COMES NOW New-Tronics Ltd. (the “Debtor”), the debtor and debtor-in-possession in the above styled and numbered Chapter 11 bankruptcy case (the “Bankruptcy Case”), and files its *Emergency Motion to Extend Deadline to File Schedules and Statement of Financial Affairs* (the “Motion”), respectfully stating as follows:

**I. PROCEDURAL BACKGROUND**

1. On August 29, 2023 (the “Petition Date”), the Debtor filed its voluntary petition for relief under Chapter 11 of the United States Bankruptcy Code (the “Bankruptcy Code”), thereby initiating the Bankruptcy Case and creating its bankruptcy estate (the “Estate”). The Debtor remains in possession of the Estate. No trustee or examiner has been appointed. The

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 0973. The location of the Debtor’s service address is: 113 Cambridge Park Trail, Weatherford, Texas 76088.

Court has jurisdiction over this Bankruptcy Case and this Motion under 28 U.S.C. § 1334. This Motion is a core proceeding under 28 U.S.C. § 157(b)(2).

## **II. FACTUAL BACKGROUND**

2. The Debtor's President, Michael Boyer, is the person most knowledgeable about the assets and liabilities of the Debtor and will be the person executing the Debtor's schedules and statement of financial affairs. Mr. Boyer is undergoing a medical procedure on September 6, 2023 and will be unavailable to finalize the necessary filings (due September 12, 2023) until approximately two (2) weeks following the procedure. Therefore, the Debtor requests a deadline of September 29, 2023 to file its schedules and statement of financial affairs (and any other filings otherwise due fourteen (14) days following the Petition Date pursuant to Bankruptcy Rule 1007(c)).

## **III. RELIEF REQUESTED**

3. By this Motion, the Debtor seeks an order extending the deadline for it to file its schedules and statement of financial affairs by two and a half weeks, from September 12, 2023 to September 29, 2023.

## **IV. ARGUMENT AND AUTHORITIES**

4. Normally, Bankruptcy Rule 1007 requires a debtor-in-possession in a voluntary Chapter 11 case to file its schedules and statements of financial affairs within fourteen (14) days of the filing of the petition. *See* FED. R. BANKR. P. 1007(c). The Debtor seeks a short extension of this deadline because the Debtor's principal person responsible for and able to complete the necessary filings will be unavailable due to a long-planned medical procedure. The Debtor has only seven (7) employees and Mr. Boyer is the only person having all the necessary information to work with counsel to complete the schedules and statement of financial affairs. Moreover, in a small bankruptcy case such as this, the Debtor does not have the financial ability to retain a

financial advisor to assist in the preparation. Rule 7001(c) provides that the Court may extend the deadline to file schedules and statements “on motion for cause shown.” The Debtor submits that the above factors support granting the requested extension.

**V. PRAYER**

WHEREFORE, PREMISES CONSIDERED, the Debtor respectfully requests that the Court enter an order: (i) granting this Motion; (ii) extending the deadline for the Debtor to file its schedules of assets and liabilities, statement of financial affairs, and all other filings for which Bankruptcy Rule 1007(c) prescribes a fourteen (14) day deadline up to and including September 29, 2023; and (iii) granting the Debtor such other and further relief to which it may be justly entitled.

RESPECTFULLY SUBMITTED this 29th day of August, 2023.

**MUNSCH HARDT KOPF & HARR, P.C.**

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